

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**GENOVA BURNS LLC**

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In re:

**LTL MANAGEMENT LLC,<sup>1</sup>**

Debtor.

Chapter 11

Case No. 23-12825 (MBK)

Honorable Michael B. Kaplan

**LTL MANAGEMENT LLC,**

Plaintiff,

v.

**THOSE PARTIES LISTED ON  
APPENDIX A TO COMPLAINT  
and JOHN AND JANE  
DOES 1-1000,**

Defendants.

Adv. Pro. No. 23-01092 (MBK)

### **NOTICE OF APPEAL AND STATEMENT OF ELECTION**

#### **Part 1: Identify the Appellant(s):**

1. **Names(s) of appellant(s):** The Official Committee of Talc Claimants.

2. **Position of appellant(s) in the bankruptcy case that is the subject of this appeal:**

Appellant is an official committee of tort claimants in the underlying bankruptcy case. Appellant is also an intervenor in Adversary Case No. 23-01092 (MBK).

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<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**Part 2: Identify the subject of this appeal:**

1. **Describe the judgment, order, or decree appealed from:** Appellant, pursuant to 28 U.S.C. § 158(a) and Federal Rules of Bankruptcy Procedure 8001(a), hereby gives notice of appeal to the United States District Court for the District of New Jersey from each and every part of the Order of the United States Bankruptcy Court for the District of New Jersey filed on July 14, 2023, in which the bankruptcy court stayed and enjoined the Defendants listed in Appendix A to the Complaint from commencing or conducting any trial or appeal of any Debtor Talc Claim through August 22, 2023 against Janssen Pharmaceuticals Inc., Kenvue Inc., and any of the Protected Parties identified in Appendix B to the Complaint. *See* Order (Adv. Dkt. No. 203) (annexed hereto, as **Exhibit “A”**).

2. **State the date on which the judgment, order, or decree was entered:** The Order (Exhibit A) was entered on July 14, 2023.

**Part 3: Identify the other parties to the appeal:**

List the names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys:

<b>Party</b>	<b>Attorneys</b>
Appellant: the Official Committee of Talc Claimants	<b>GENOVA BURNS LLC</b> Daniel M. Stolz, Esq. Donald W. Clarke, Esq. dstolz@genovaburns.com dclarke@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126  <b>BROWN RUDNICK LLP</b> David J. Molton, Esq. Jeffrey L. Jonas, Esq. Michael S. Winograd, Esq. Eric R. Goodman, Esq.

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Appellee - Plaintiff: LTL Management, LLC	<b>WOLLMUTH MAHER &amp; DEUTSCH LLP</b> Paul R. DeFilippo, Esq. pdefilippo@wmd-law.com 500 Fifth Avenue New York, NY 10110 Tel: (212) 382-3300 Fax: (212) 382-0050 <b>JONES DAY</b> Gregory M. Gordon, Esq. Brad B. Erens, Esq. Dan B. Prieto, Esq. Amanda Rush, Esq. gmgordon@jonesday.com bberens@jonesday.com dbprieto@jonesday.com asrush@jonesday.com 2727 N. Harwood Street Dallas, TX 75201 Tel: (214) 220-3939 Fax: (214) 969-5100
Defendants (see <b>Exhibit B</b> )	See <b>Exhibit B</b>
Interested party: the Protected Parties (see <b>Exhibit C</b> )	See <b>Exhibit C</b>
Interested party/objector: Arnold & Itkin LLP	<b>PACHULSKI STANG ZIEHL &amp; JONES LLP</b> Laura Davis Jones Colin R. Robinson Peter J. Keane ljones@pszjlaw.com crobinson@pszjlaw.com pkeane@pszjlaw.com 919 N. Market Street, 17th Floor Wilmington, DE 19801 Telephone: (302) 652-4100 Facsimile: (302) 652-4400

Interested party/objector: Paul Crouch,  
Individually and as Executor and as  
Executor Ad Prosequendum of the  
Estate of Cynthia Lorraine Crouch

**LEVY KONIGSBERG, LLP**

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**THE RUCKDESCHEL LAW FIRM, LLC**

Jonathan Ruck Deschel  
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8357 Main Street  
Ellicott City, Maryland 21043

<p>Interested party/objector: Travelers Casualty and Surety Company (f/k/a The Aetna Casualty and Surety Company)</p>	<p><b>GIMIGLIANO MAURIELLO &amp; MALONEY</b>  A Professional Association  Stephen V. Gimigliano  John Maloney Robin Rabinowitz  sgimigliano@lawgmm.com  jmaloney@lawgmm.com  rrabinowitz@lawgmm.com  163 Madison Avenue, Suite 500  P.O. Box 1449  Morristown, New Jersey 07962-1449  (973) 946-8360</p> <p><b>SIMPSON THACHER &amp; BARTLETT, LLP</b>  Andrew T. Frankel  Michael H. Torkin  Kathrine A. McLendon  Jonathan Mitnick  afrankel@stblaw.com  michael.torkin@stblaw.com  kmclendon@stblaw.com  jonathan.mitnick@stblaw.com  425 Lexington Avenue  New York, New York 10017  Tel: (212) 455-2000</p>
<p>Interested party/objector: United States Trustee</p>	<p><b>THE OFFICE OF THE UNITED STATES TRUSTEE, ANDREW R. VARA, UNITED STATES TRUSTEE, REGIONS 3 &amp; 9</b>  Jeffrey M. Sponder, Esq.  Lauren Bielskie, Esq.  Linda Richenderfer, Esq.  jeffrey.m.sponder@usdoj.gov  lauren.bielskie@usdoj.gov  linda.richenderfer@usdoj.gov  One Newark Center, Suite 2100  Newark, NJ 07102  Tel: (973) 645-3014  Fax: (973) 645-5993</p>
<p>Interested party/objector: Mesothelioma Plaintiff Katherine Tollefson and Certain Mesothelioma Plaintiffs</p>	<p><b>MAUNE RAICHLE HARTLEY FRENCH &amp; MUDD, LLC</b>  Clayton L. Thompson, Esq.  cthompson@mrhfmlaw.com  Suzanne M. Ratcliffe, Esq.  sratcliffe@mrhfmlaw.com</p>

	150 West 30th Street, Suite 201 New York, NY 10001 Tel: (800) 358-5922
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**Part 4: Not Applicable (No BAP in this District)**

**Part 5: Signature**

DATED this 21<sup>st</sup> day of July, 2023.

Respectfully submitted,

**GENOVA BURNS, LLC**

*/s/ Daniel M. Stolz*

By: \_\_\_\_\_

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